

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE NEW YORK CITY DISTRICT COUNCIL OF  
CARPENTERS PENSION FUND, NEW YORK CITY  
DISTRICT COUNCIL OF CARPENTERS WELFARE FUND,  
NEW YORK CITY DISTRICT COUNCIL OF CARPENTERS  
VACATION FUND, NEW YORK CITY DISTRICT COUNCIL  
OF CARPENTERS ANNUITY FUND, NEW YORK CITY  
DISTRICT COUNCIL OF CARPENTERS APPRENTICESHIP,  
JOURNEYMAN RETRAINING, EDUCATIONAL AND  
INDUSTRY FUND, NEW YORK CITY DISTRICT COUNCIL  
OF CARPENTERS CHARITY FUND, UNITED  
BROTHERHOOD OF CARPENTERS AND JOINERS OF  
AMERICA FUND and THE NEW YORK CITY AND VICINITY  
CARPENTERS LABOR-MANAGEMENT CORPORATION, by  
MICHAEL J. FORDE and PAUL O'BRIEN, as TRUSTEES, and  
MICHAEL J. FORDE AS EXECUTIVE SECRETARY-  
TREASURER, DISTRICT COUNCIL FOR NEW YORK CITY  
AND VICINITY, UNITED BROTHERHOOD OF CARPENTERS  
AND JOINERS OF AMERICA,

08 CV 4460 (PAC)  
ECF CASE

**NOTICE OF MOTION**

Plaintiffs,

-against-

KRAUS DRAPERY INSTALLATION, INC. A/K/A KDI, INC.,

Defendant.

-----X  
C O U N S E L :

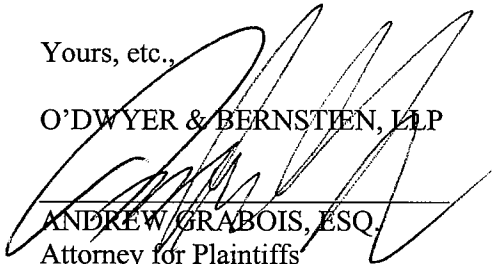
PLEASE TAKE NOTICE, that upon the annexed affidavit of Andrew GraBois, Esq. sworn to on June 12, 2008, the stipulated facts and exhibits annexed thereto, and upon all pleadings and proceedings heretofore and herein, the undersigned, on behalf of the plaintiffs, will move this Court before the Honorable Paul A. Crotty, United States District Court Judge at the United States Courthouse, Southern District of New York, located at 500 Pearl Street, Courtroom 20-C, New York, New York 10007, at a date and time to be set by the Court, for an Order granting plaintiffs' motion for default judgment, and for such other and further relief as the Court deems proper and just.

Dated: New York, New York  
June 12, 2008

Yours, etc.,

O'DWYER & BERNSTEIN, LLP

By:

  
ANDREW GRABOIS, ESQ.  
Attorney for Plaintiffs  
52 Duane Street, 5th Floor  
New York, New York 10007  
(212) 571-7100

TO: Kraus Drapery Installation, Inc. a/k/a KDI, Inc.  
20 Washington Avenue  
Whippany, NJ 07012